

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MOOG INC.,

Plaintiff,

v.

Case No. 1:22-cv-00187

SKYRYSE, INC., ROBERT ALIN PILKINGTON,
MISOOK KIM, and DOES NOS. 1-50,

Defendants.

NOTICE OF MOTION FOR CLARIFICATION

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law in Support of Plaintiff's Emergency Motion for Clarification of the Court's Order at ECF 216 and the Declaration of Rena Andoh, with Exhibits, Plaintiff Moog Inc. ("Moog"), by and through its undersigned counsel, Sheppard, Mullin, Richter & Hampton, LLP and Hodgson Russ LLP, hereby moves this Court for an order clarifying that the temporary stay on "pending discovery deadlines" does not apply to the production of documents under Section IV.1 of the Inspection Protocol.

Moog respectfully requests that Skyrise be ordered to file an opposition to the Motion for Clarification by August 18, and that this matter be heard on an expedited basis during the already-scheduled hearing on August 25. Moog is prepared to waive a reply brief.

Date: August 11, 2022

**SHEPPARD, MULLIN, RICHTER &
HAMPTON LLP**

Attorneys for Plaintiff Moog Inc.

By: s/Rena Andoh

Rena Andoh

Travis J. Anderson (admitted *pro hac vice*)

Tyler E. Baker (admitted *pro hac vice*)

Kazim A. Naqvi (admitted *pro hac vice*)

30 Rockefeller Plaza

New York, New York 10112

Telephone: (212) 653-8700

and

HODGSON RUSS LLP

By: s/Robert J. Fluskey, Jr.

Robert J. Fluskey, Jr.

Melissa N. Subjeck

Reetuparna Dutta

Pauline T. Muto

The Guaranty Building

140 Pearl Street, Suite 100

Buffalo, New York 14202

(716) 856-4000